

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF PUERTO RICO

IN RE:

CASE NO: 10-06528 (MCF)

MOISES MARTINEZ PAGAN

CHAPTER 13

ASSET CASE

Debtor

DEBTOR'S OBJECTION TO CLAIM #1-1 FILED BY PR ADQUISITIONS, LLC

TO THE HONORABLE COURT:

COMES NOW debtor, represented through its undersigned counsel and respectfully objects proof of claim number 1-1 filed by PR Acquisitions., LLC in the amount of \$17,690.78 and assigns the following reasons for the same:

- 1) The proof of claim does not comply with Federal Rule of Bankruptcy Procedure 3001(c) because the claim is based on an alleged auto deficiency, but no supporting documents are attached to the proof of claim.
- 2) The proof of claim filed fails to provide account transaction summary or other information that would show how the total amount claimed has been calculated. An itemization of the principal balance of the debt, interest and other charges (if any) is not attached to the proof of claim, as required by the instructions to Official Form 10.
- 3) The only document attached to the claim form is a "Bill of Sale and Assignment of Assets", which fails to provide any information related to the alleged debt
- 4) Debtor has not listed the claim, and does not acknowledge it.
- 5) PR Acquisitions., LLC is a buyer of debts that repeatedly files undocumented, unsubstantiated proofs of claims in this Court. In this case only, it has filed 2 claims in this manner, in violation of Federal Rule of Bankruptcy Procedure 3001(c).

WHEREFORE debtor respectfully requests of this Honorable Court to disallow the proof of claim filed by PR Acquisitions., LLC, and order such other and further relief as is just and proper.

NOTICE: Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this Motion has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this Motion with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the Motion will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

In San Juan P R this 27th day of September, 2010.

CERTIFICATE OF SERVICE: I hereby certify that on this same date I have electronically filed this Motion with the Clerk of the Court using the CM/ECF System which sends notifications of such filings to registered parties, Chapter 13 Trustee and US Trustee Monsita Lecaroz ustpreregion21.hr.ecf@usdoj.gov. I further certify that I have served copy of this document thereof in the US Mail to **PR Aqduisitions LLC**, 250 Muñoz Rivera Avenue Suite 1200, Hato Rey, Puerto Rico 00918, non CM/ECF participants, and to all parties in interest as per the attached master address list, copy of which is attached to this document.

/S/ ROSA E. HILERIO ECHEVARRÍA, ESQ.
Bar no: 221404
Attorney for: MOISES MARTINEZ PAGAN
PO Box 3289
Aguadilla, PR 00605
787-619-4610 /Fax-787-721-4648
e-mail: rosahilerio@yahoo.com

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District of Puerto Rico
Ponce
Mon Sep 27 14:54:59 AST 2010

ISLAND FINANCE
PO BOX 71504
SAN JUAN, PR 00936-8604

WESTERNEBANK
PO BOX 1180
MAYAGUEZ, PR 00681-1180

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901-1938

US Bankruptcy Court District of PR
Southwestern Divisional Office
US Courthouse and Post Office Building
93 Atocha Street, Second Floor
Ponce, PR 00730-3759

LCDA. MARIA LUISA ROJAS
PO BOX 1450
MAYAGUEZ, PR 00681-1450

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

ROSA E. HILERIO ECHEVARRIA
PO BOX 3289
AGUADILLA, PR 00605-3289

CAVALRY PORTFOLIO SERVICES, LLC
7 SKYLINE DRIVE, THIRD FLOOR
HAWTHORNE, NY 10532-2156

PR ACQUISITIONS LLC
250 MUNOZ RIVERA AVENUE SUITE 1200
HATO REY PR 00918-1814

MOISES MARTINEZ PAGAN
A 3 VILLA CAHAN
LAJAS, PR 00667

End of Label Matrix
Mailable recipients 10
Bypassed recipients 0
Total 10